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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHEENA ELKIND,

Defendant.

Case No.: 2:20-mj-00709-BNW-1

**STIPULATION TO CONTINUE
PRELIMINARY EXAMINATION DATE**

(ELEVENTH REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, District of Nevada, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for SHEENA ELKIND, that the Preliminary Examination hearing currently scheduled for January 27, 2021 at 10:00 a.m., be vacated and set to a date and time convenient to this court but no sooner than ninety (90) days.

The Stipulation is entered into for the following reasons:

1. Following continued investigation by both parties to this matter, plea negotiations are continuing and will require the additional requested time to resolve.
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
5. Denial of this request for continuance would result in a miscarriage of justice.
6. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
7. This is the eleventh request for a continuance of the preliminary hearing date in this case.

DATED this 19th day of January 2022.

GABRIEL L. GRASSO, P.C.
Counsel for SHEENA ELKIND

CHRISTOPHER CHIOU
Acting United States Attorney

By /s/ Gabriel L. Grasso
GABRIEL L. GRASSO, ESQ.

By /s/ Edward G. Veronda
Assistant United States Attorney

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**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Plea negotiations are continuing and will require the additional requested time to resolve
2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
5. Denial of this request for continuance would result in a miscarriage of justice.

7. This is the eleventh request for a continuance of the preliminary hearing date in this case.

8 The ends of justice served by granting said continuance outweigh the best interest
9 of the public and the defendant in a speedy trial, since the failure to grant said continuance
10 would be likely to result in a miscarriage of justice, would deny the parties herein sufficient
11 time and the opportunity within which to be able to effectively and thoroughly prepare for
12 trial, taking into account the exercise of due diligence.
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IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently scheduled for January 27, 2022, at 1:00 p.m. be vacated and continued to April 28, 2022 at 10:00 a.m.

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